

Robert Weigel (RW 0163)
Howard S. Hogan (HH 7995)
GIBSON, DUNN & CRUTCHER, LLP
200 Park Avenue
New York, New York 10166
(212) 351-4000

*Attorneys for Plaintiffs Gucci America, Inc.
and Chloé SAS*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
GUCCI AMERICA, INC. and CHLOÉ SAS,

Plaintiffs,

-against-

HGL ENTERPRISES;
EZDESIGNERREPLICAS.COM;
DESIGNERREPLICAS.HIGHPOWERSITES.
COM; HENRY LEIZGOLD a/k/a ENRIQUE
GOSMAN LEIZGOLD; HERLINDA LEIZGOLD
a/k/a LINDA LEIZGOLD a/k/a HERLINDA
PASAPERA; ABC COMPANIES; and JOHN
DOES,

Defendants.
----- X

07 Civ. 5569

**DECLARATION OF
YULIYA P. KUKLINA**

I, Yuliya P. Kuklina, of full age and under penalty of perjury, declare and state as follows:

1. I am a private investigator employed as an agent of Alaco Limited ("Alaco"). Alaco is retained by counsel for Plaintiffs Gucci America, Inc. ("Gucci") and Chloé SAS ("Chloé") (collectively, "Plaintiffs"). I make this declaration in support of Plaintiffs' application for a temporary restraining order and preliminary injunction against HGL Enterprises; EZDesignerReplicas.com, DesignerReplicas.HighPowerSites.com, Henry Leizgold a/k/a Enrique

Gosman Leizgold, Herlinda Leizgold a/k/a Linda Leizgold a/k/a Herlinda Pasapera, ABC Companies, and John Does (collectively, "Defendants"). The information set forth herein is based upon my personal knowledge, and I could competently testify thereto if called to do so.

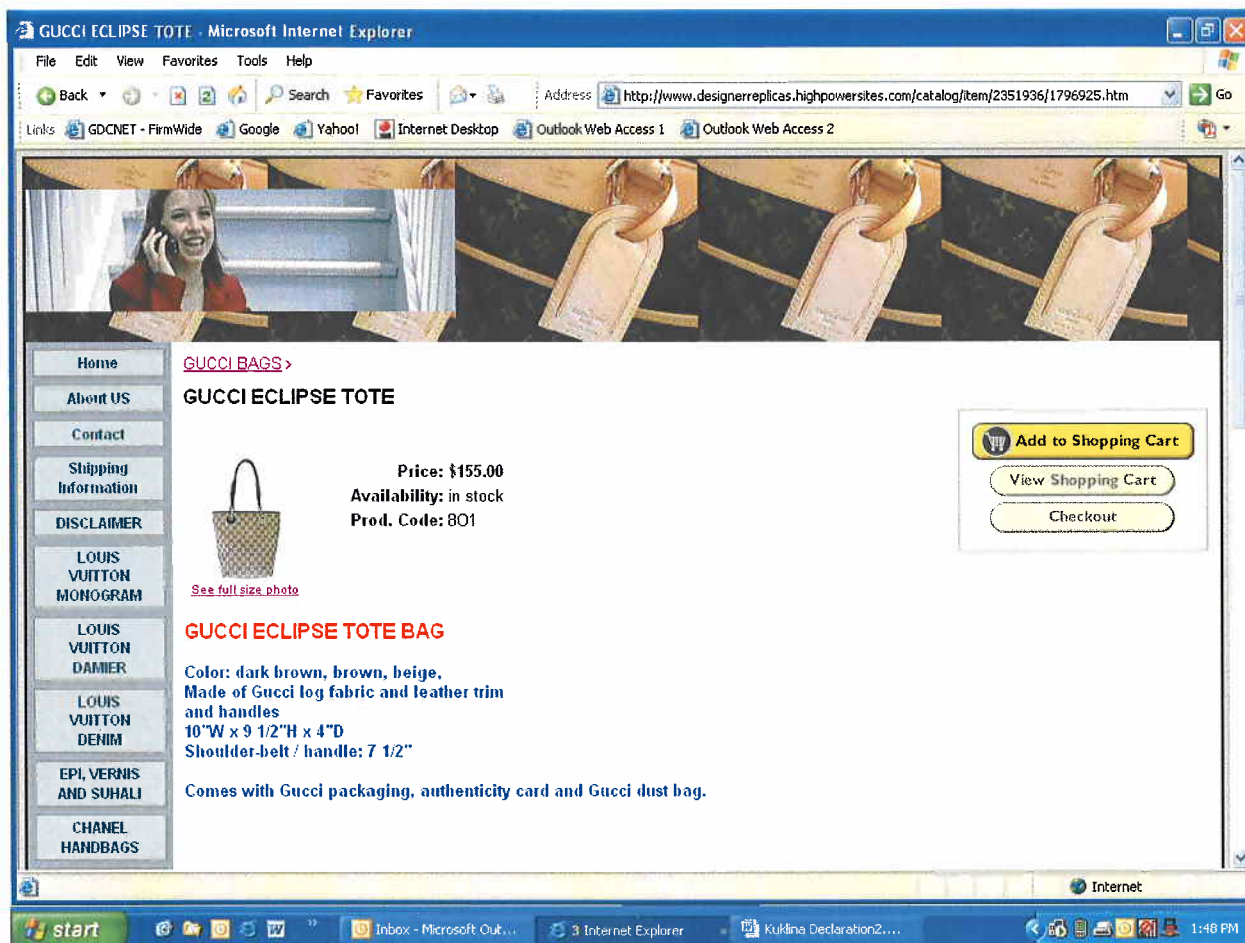
2. In 2006, I was asked to supervise an investigation into sales over the Internet to customers in the United States of various goods that make use of the trademarks of Gucci and Chloé. Alaco's investigation looked into many websites that seemed to be offering counterfeit versions of Plaintiffs' products. After these websites were identified, I purchased items that they offered for sale to make certain that the goods were, in fact, counterfeit. As detailed below and as corroborated by representatives from Gucci and Chloé, this investigation confirmed that the websites named as Defendants were, in fact, selling counterfeit products, and that Defendants HGL Enterprises, Henry Leizgold, and Herlinda Leizgold are principally responsible for the activities of these websites and receive the profits of sales of the counterfeit products. Within this declaration, I refer to Defendants' products as "Counterfeit Products" based on the fact that: (a) Defendants themselves admit that their products are "Designer Replicas" rather than authentic goods, and describe their goods as "replicas, imitations, or reproductions"; and (b) representatives of both Gucci and Chloé have confirmed that the products I purchased from Defendants are counterfeit.

3. As a part of this investigation, I negotiated with agents of the websites to see what I could determine about how the website operators conducted their business. In some instances, I sought or otherwise obtained information about these transactions from financial institutions such as banks and credit card companies. I and other agents of Alaco also engaged in searches of publicly available data concerning Defendants' business to try and determine its corporate structure, the principals involved, and the possible sources of its Counterfeit Products. I and

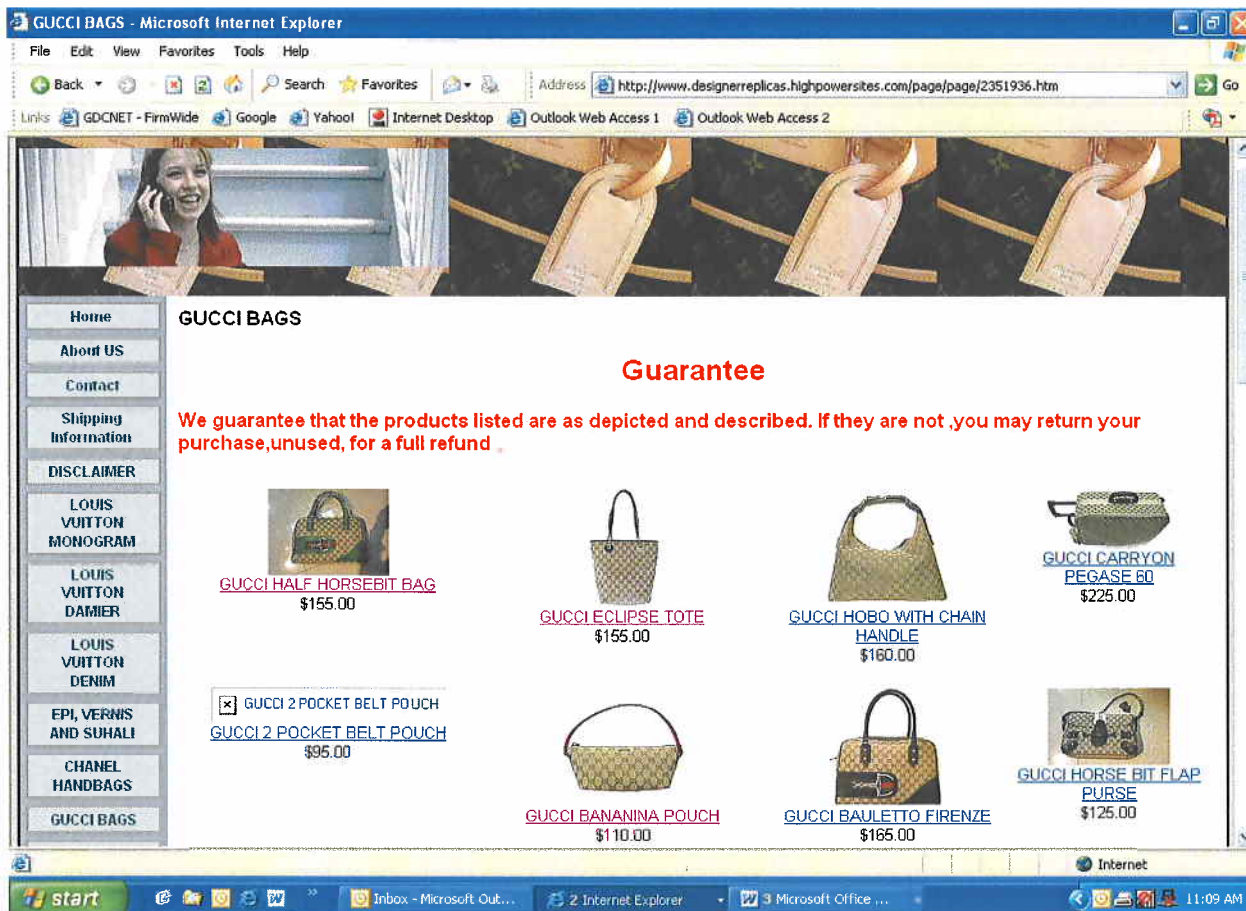
other agents of Alaco also observed Defendants' websites to be certain that their operations were ongoing, rather than temporary, in nature. I and other agents of Alaco sought to determine whether Defendants have any offices, warehouses, inventory, property, or other assets within the United States. Each of these steps was necessary to be certain that the Defendants in this action were engaged in counterfeiting, and to determine the scope of their activities, because counterfeiters often go to great lengths in order to conceal their unlawful conduct.

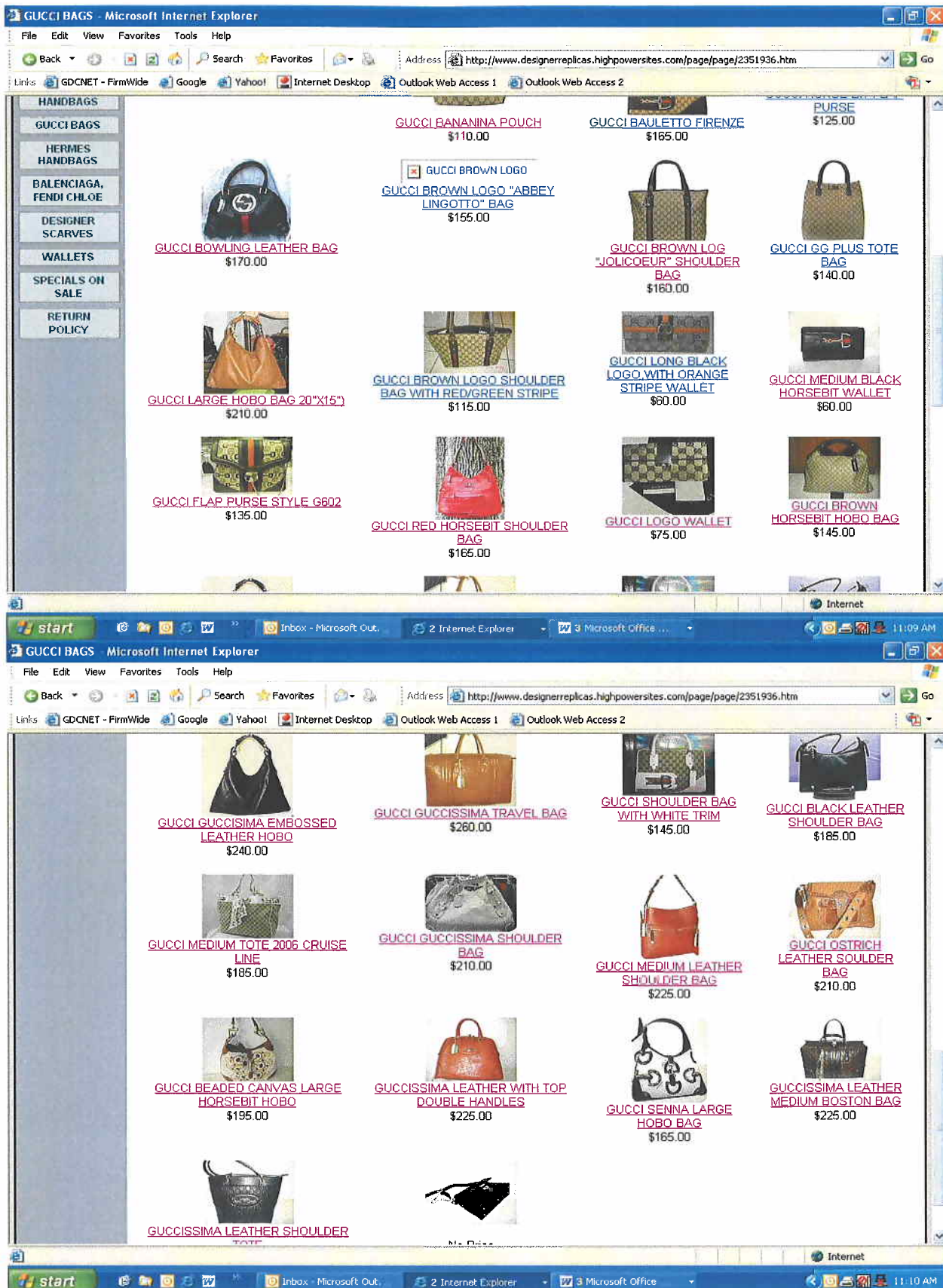
4. In particular, Alaco learned that Defendants were marketing and offering for sale Counterfeit Products to the consuming public through the use of the Uniform Resource Locator ("URL") designations <www.DesignerReplicas.HighPowerSites.com> and <www.EZDesignerReplicas.com>.

5. For example, shown below is a true and accurate screen shot of Defendants' website at www.DesignerReplicas.HighPowerSites.com. Defendants' website repeatedly refers to its Counterfeit Products as "Gucci Bag[s]."



6. Defendants' website at www.DesignerReplicas.HighPowerSites.com offers at least 39 different types of Counterfeit Products as "Gucci" handbags. Below are true and accurate screen shots of Defendants' website at www.DesignerReplicas.HighPowerSites.com showing the total number of products offered as "Gucci" products.





WALLETS AND KEY CHAINS - Microsoft Internet Explorer

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Information

DISCLAIMER

LOUIS VUITTON MONOGRAM

LOUIS VUITTON DAMIER

LOUIS VUITTON DENIM

EPI VERNIS AND SUHALI

CHANEL HANDBAGS

GUCCI BAGS

HERMES HANDBAGS

BALENCIAGA, FENDI CHLOE

DESIGNER SCARVES

WALLETS

SPECIALS ON SALE

RETURN POLICY

We guarantee that the products listed are as depicted and described. If they are not ,you may return your purchase,unused, for a full refund .

LV MONOGRAM PORT TRESOR
\$49.00

LV MULTICOLOR PORT TRESOR
\$49.00

LV DAMIER PORT TRESOR
\$59.00

LV VERNIS MAT LEATHER PORT TRESOR
\$65.00

LV EPI LEATHER PORT TRESOR
\$65.00

LV MONOGRAM BILLFOLD WALLET
\$49.00

LV DAMIER MULTIPLE BILL HOLDER
\$55.00

LV MULTICOLOR COMPACT WALLET
\$49.00

LV DAMIER ZIP COMPACT WALLET
\$55.00

LV EPI LEATHER COMPACT WALLET
\$65.00

GUCCI LONG BLACK WALLET WITH LOGO
\$75.00

LOUIS VUITTON MONOGRAM CERISE SHORT WALLET
\$49.00

SPECIALS ON SALE - Microsoft Internet Explorer

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Contact

Shipping Information

DISCLAIMER

LOUIS VUITTON MONOGRAM

LOUIS VUITTON DAMIER

LOUIS VUITTON DENIM

EPI VERNIS AND SUHALI

CHANEL HANDBAGS

GUCCI BAGS

HERMES HANDBAGS

BALENCIAGA, FENDI CHLOE

SPECIALS ON SALE

Guarantee

We guarantee that the products listed are as depicted and described. If they are not ,you may return your purchase,unused, for a full refund .

LOUIS VUITTON CERISES SPEEDY 25
\$60.00

LOUIS VUITTON CERISES PAPILLON
\$60.00

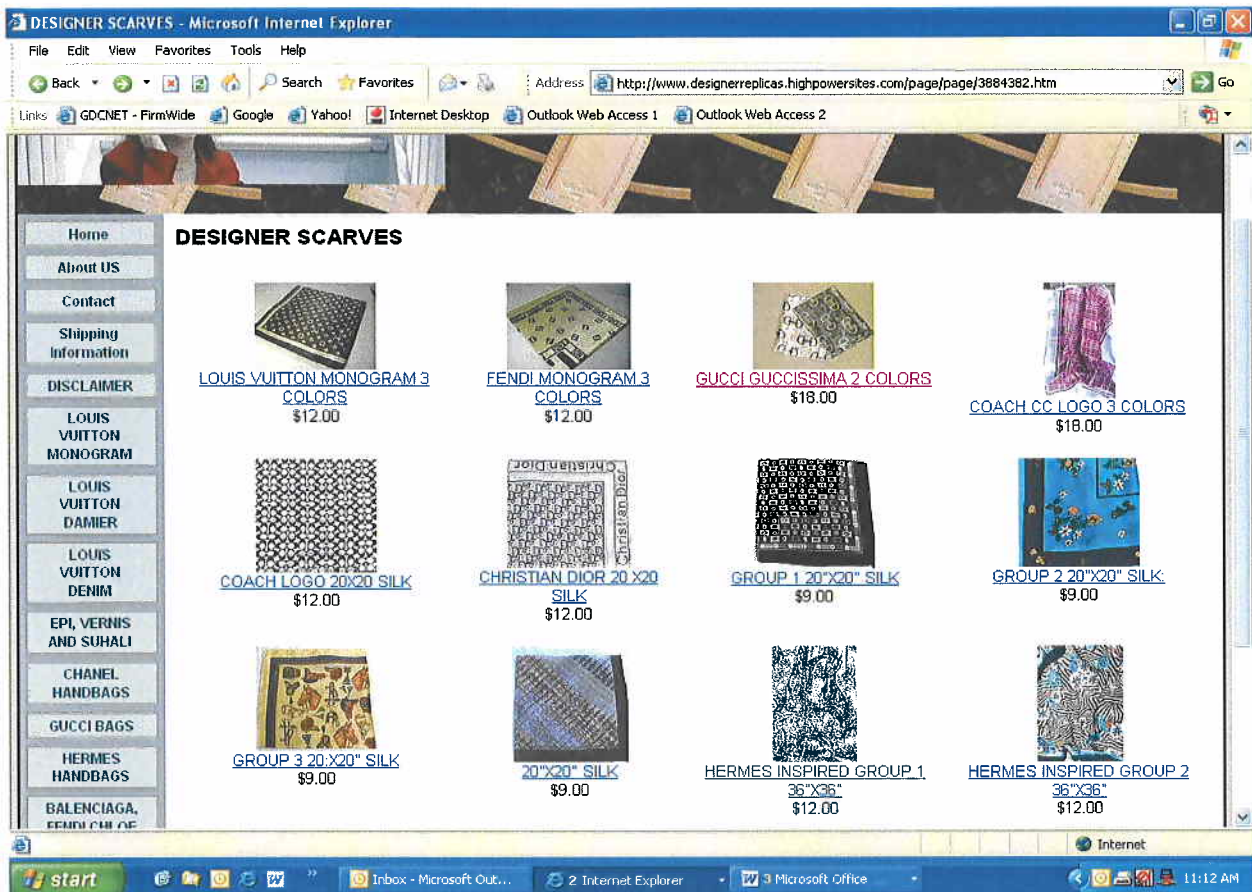
GUCCI GREEN AND RED STRIPE TOTE
Orig. Price: \$130.00
Sale Price: \$85.00

GUCCI "ABBEY LINGOTTO"
Orig. Price: \$155.00
Sale Price: \$85.00

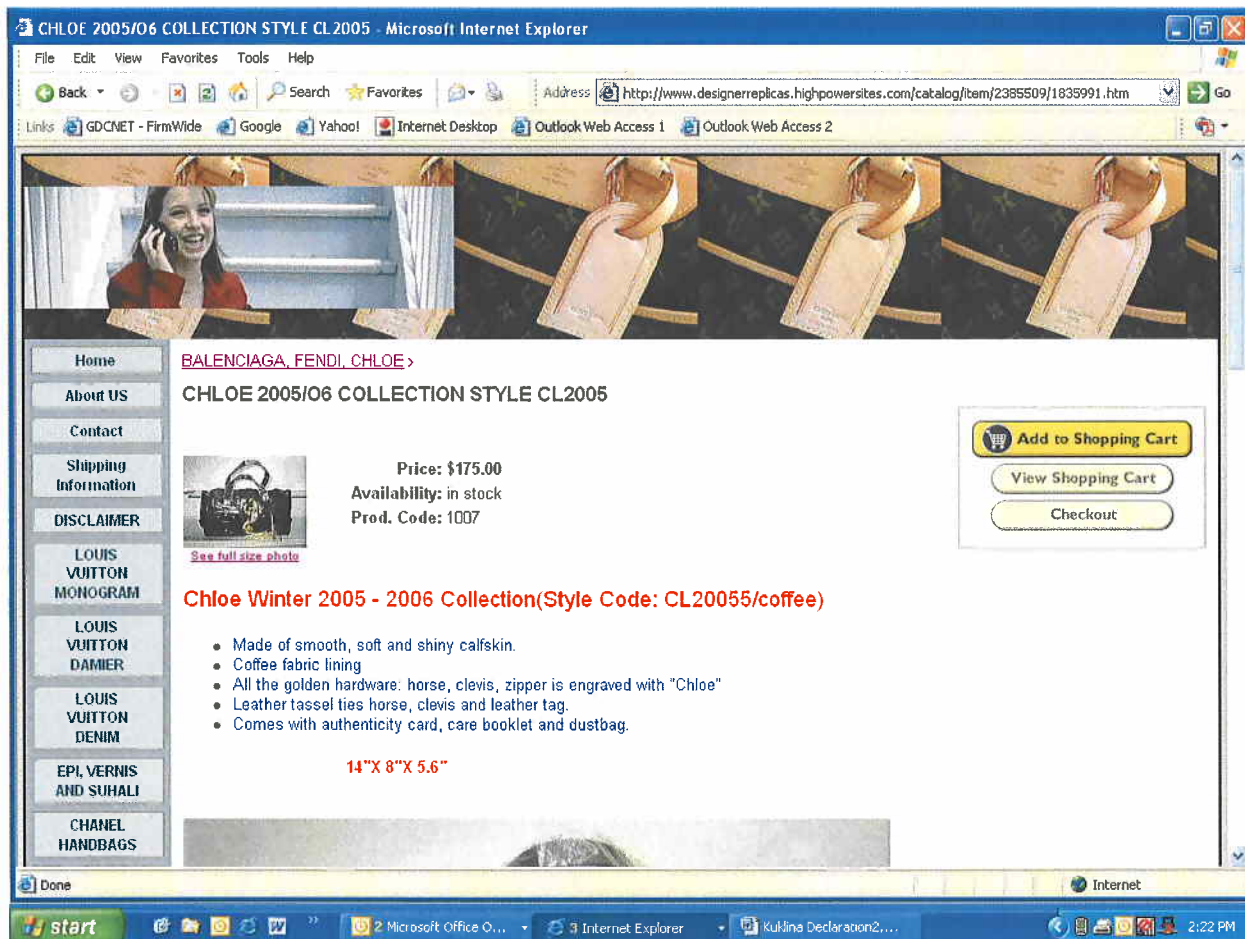
GUCCI MONOGRAM SMALL DOCUMENT BAG
Orig. Price: \$85.00
Sale Price: \$49.00

CHANEL CAMRON LARGE BLACK TOTE WITH SNAKE CC
Orig. Price: \$135.00
Sale Price: \$95.00

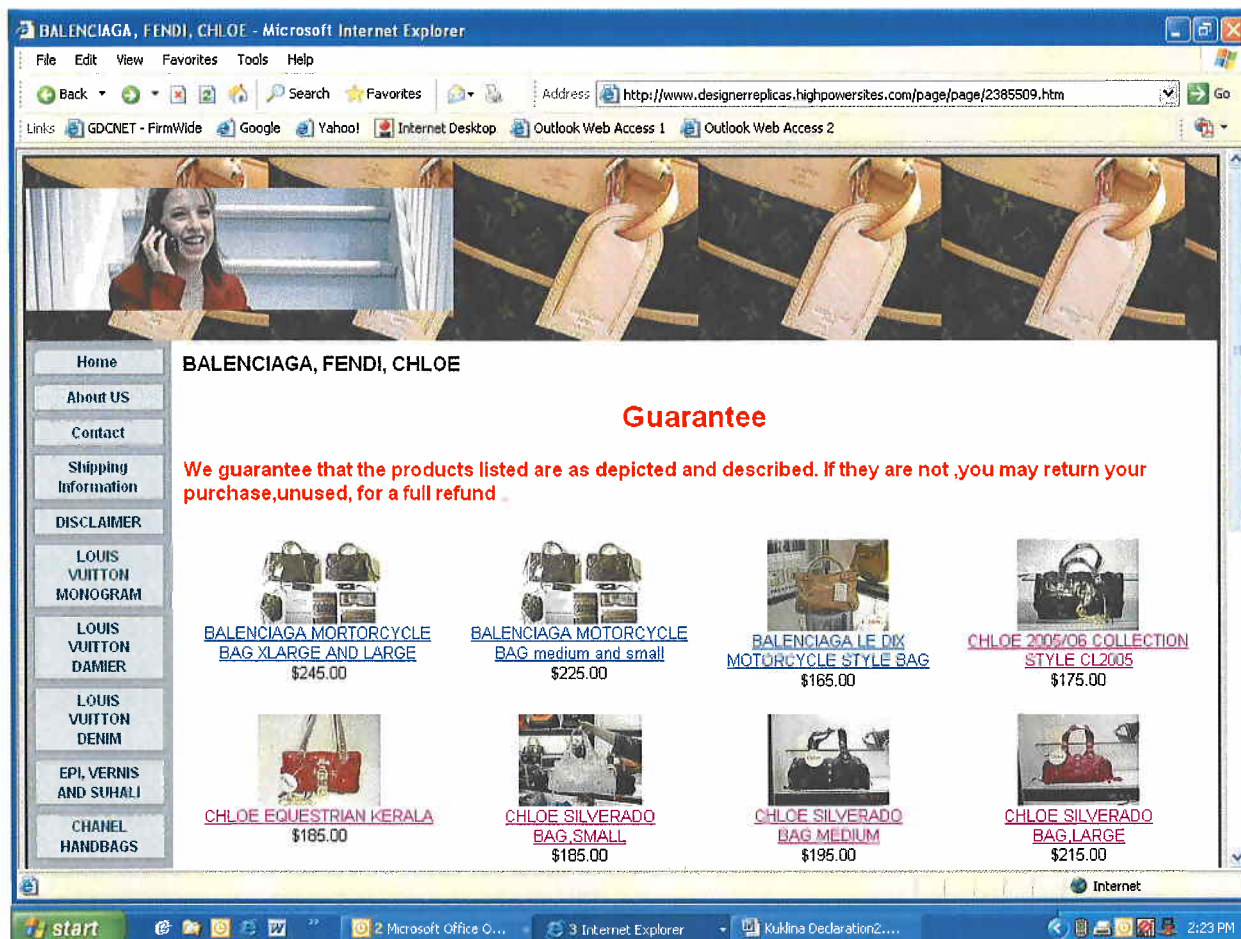
CHANEL MADMOISELLE SHOULDER TOTE
Orig. Price: \$185.00
Sale Price: \$125.00



7. Similarly, shown below is a true and accurate screen shot of Defendants' website at www.DesignerReplicas.HighPowerSites.com, making liberal use of the trademark name "Chloe."



8. Defendants' website at www.DesignerReplicas.HighPowerSites.com offers at least 7 different types of Counterfeit Products as "Chloe" handbags. Below are true and accurate screen shots of Defendants' website at www.DesignerReplicas.HighPowerSites.com showing the total number of products offered as "Chloe" products.



BALENCIAGA, FENDI, CHLOE Microsoft Internet Explorer

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AND SUHALI

CHANEL
HANDBAGS

GUCCI BAGS

HERMES
HANDBAGS
















BALENCIAGA,
FENDI CHLOE

DESIGNER
SCARVES

WALLETS

SPECIALS ON
SALE

RETURN
POLICY

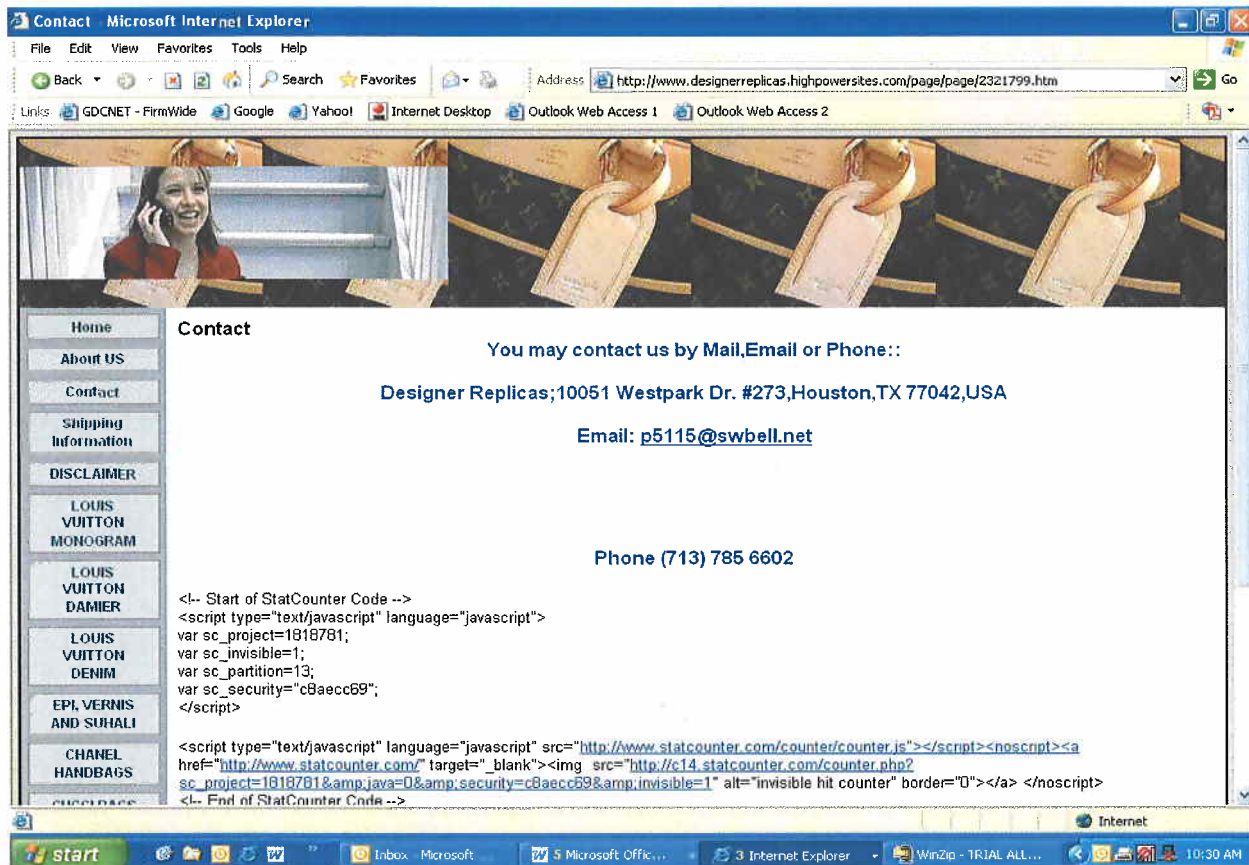
			
CHLOE EQUESTRIAN KERALA \$185.00	CHLOE SILVERADO BAG SMALL \$185.00	CHLOE SILVERADO BAG MEDIUM \$195.00	CHLOE SILVERADO BAG LARGE \$215.00
			
CHLOE PADDINGTON BAG \$195.00	FENDI SPY BAG ZUCCA CANVAS \$180.00	FENDI SPY ALLIGATOR BAG \$245.00	FENDI SPY LARGE PLEAT BAG \$280.00
			
FENDI BROWN LOGO BUCKET BAG \$165.00	FENDI BROWN LOGO FLAP BAG \$165.00	FENDI SPY BAG WITH BRAIDED HANDLES \$225.00	CHLOE PADDINGTON RED TAN \$195.00
			
FENDI FLAP PURSE \$165.00	FENDI CHEF ZUCCHINO CAPUCCINO PURSE \$135.00	FENDI MINI MAMA ZUCCHINO BAG \$125.00	

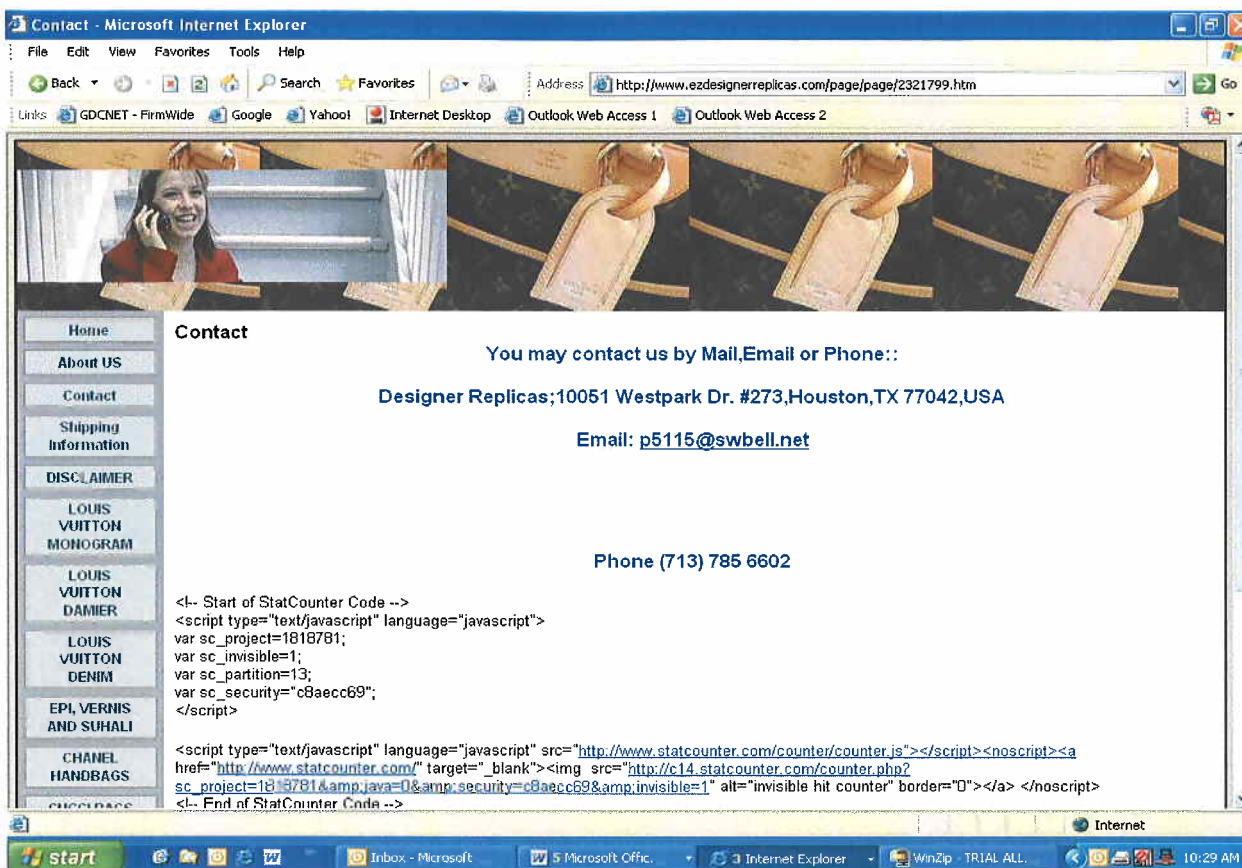
Powered by [HighPowerSites](#)

<http://www.designerreplicas.highpowersites.com/catalog/item/2385509/1853759.htm> Internet

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9. Defendants also make liberal use of the trademark names “Gucci” and “Chloe” on www.EZDesignerReplicas.com. In fact, Defendants’ www.EZDesignerReplicas.com website is the exact same website as www.DesignerReplicas.HighPowerSites.com. The only difference between the two websites is their URL address. Below are true and accurate screen shots of the “Contact” pages of Defendants’ websites at www.DesignerReplicas.HighPowerSites.com and www.EZDesignerReplicas.com.





DesignerReplicas.HighPowerSites.com “Chloe” Orders 747719 and 747626

10. I placed an order through the website www.DesignerReplicas.HighPowerSites.com for a bag identified by the website at www.DesignerReplicas.HighPowerSites.com as a “Chloe” bag with a description of “Chloe Silverado Bag, Medium,” and for a bag identified by the website at www.DesignerReplicas.HighPowerSites.com as a “Chloe Paddington Bag.” The order numbers provided by agents of www.DesignerReplicas.HighPowerSites.com were 747719 and 747626, respectively. The cost of the purchase of each bag was \$195, and there was no charge for shipping. Alaco paid for one of the orders through an account with a Bloomindale’s Insider Visa credit card, and for the other order through an account with a Citibank MasterCard debit card.